

EXHIBIT B

VICTIMS' RECOVERY LAW CENTER

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification Nos.: 61815/317426

121 South Broad Street, 18th Floor

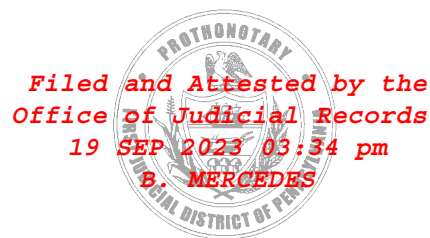
Philadelphia, Pennsylvania 19107

215-546-1433 - Telephone

215-644-8754 - Facsimile

david@victimrecoverylaw.com

keith@victimrecoverylaw.com



Attorneys for Plaintiff

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
	:	AUGUST TERM, 2023
v.	:	NO. 02980
	:	
POLYMER80, INC., et al.	:	

AFFIDAVIT OF SERVICE

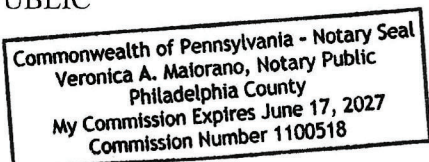
I, David P. Thiruselvam, Esquire, being duly sworn, depose and say that I caused a true and correct copy of Plaintiff's Writ of Summon to be served upon the out of state defendant, Polymer80, INC., 134 Lakes Boulevard, Dayton, NV 89403 via priority mail, signature required **9410 8036 9930 0163 0321 17**. Pursuant to the proof of delivery, the Writ of Summons was received by the defendant on September 11, 2023. A copy of the correspondence, Writ of Summon and proof of delivery are attached at Exhibit "A."

VICTIMS RECOVERY LAW CENTER**DAVID P. THIRUSELVAM, ESQUIRE****Attorney for Plaintiff**

SWORN TO AND SUBSCRIBED

BEFORE ME THIS 19th DAYOF September 2023Veronica A. Malorano

NOTARY PUBLIC





VRCLC
VICTIMS' RECOVERY
LAW CENTER

September 5, 2023

POLYMER80, INC.
ATTENTION: LEGAL/RISK MANAGEMENT
134 Lakes Boulevard
Dayton, NV 89403

**RE: Hector Garcia and Roseann Morrison, Individually and as
Co-Administrators of the Estate of Sahmya Garcia, Deceased v.
Polymer80, Inc., Marcus Burney
Philadelphia CCP Docket No. 230703100**

Dear Sir/Madam:

Please be advised that our office has been retained to represent Plaintiffs', Hector Garcia and Roseann Morrison, Individually and as Co-Administrators of the Estate of Sahmya Garcia, Deceased, for an incident that occurred on November 8, 2022, in Philadelphia, Pennsylvania. On August 29, 2023, the enclosed Writ of Summons was filed in the Philadelphia Court of Common Pleas naming Polymer80, Inc., as a Defendant.

To that end, enclosed you will find three Notices of Intent to Serve Subpoenas and Twenty (20) Day Waiver directed to The Philadelphia Police Department, The Philadelphia Office of the District Attorney, and Edward C. Meehan Jr. Esquire, the criminal defense attorney for Marcus Burney. After your review, kindly advise whether or not you will agree to waive the twenty (20) day waiting period to serve the subpoena.

You should forward the enclosed paperwork to your lawyer at once so that we may deal with him/her directly. If you do not have a lawyer or cannot afford one, go to the Philadelphia Bar Association Lawyer Referral and Information Service, One Reading Center, Philadelphia, PA 19107; (215) 238-6333.

Very Truly Yours,

/s/ David P. Thiruselvam

DAVID P. THIRUSELVAM

/ck

Encs.

VIA PRIORITY MAIL - Signature Required
9410803699300163032117

Court of Common Pleas of Philadelphia County
Trial Division**Civil Cover Sheet**

For Prothonotary Use Only (Docket Number)

AUGUST 2023**02980**

E-Filing Number: 2308060407

PLAINTIFF'S NAME HECTOR GARCIA		DEFENDANT'S NAME POLYMER80, INC.	
PLAINTIFF'S ADDRESS 1719 KOSSUTH STREET CAMDEN NJ 08104		DEFENDANT'S ADDRESS 134 LAKES BOULEVARD DAYTON NV 89403	
PLAINTIFF'S NAME ROSEANN MORRISON		DEFENDANT'S NAME MARCUS BURNEY	
PLAINTIFF'S ADDRESS 206 W. BUCK STREET PAULSBORO NJ 08066		DEFENDANT'S ADDRESS 7901 STATE ROAD PHILADELPHIA PA 19136	
PLAINTIFF'S NAME		DEFENDANT'S NAME	
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS	
TOTAL NUMBER OF PLAINTIFFS 2	TOTAL NUMBER OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input checked="" type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions	
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input checked="" type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____		
CASE TYPE AND CODE 20 - PERSONAL INJURY - OTHER			
STATUTORY BASIS FOR CAUSE OF ACTION			
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)		IS CASE SUBJECT TO COORDINATION ORDER? YES NO	
		FILED PRO PROTHY AUG 29 2023 C. SMITH	
TO THE PROTHONOTARY: Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant: <u>HECTOR GARCIA , ROSEANN MORRISON</u> Papers may be served at the address set forth below.			
NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY DAVID P. THIRUSELVAM		ADDRESS THE VICTIMS' RECOVERY LAW CENTER 121 S BROAD ST, 18TH FL PHILADELPHIA PA 19107	
PHONE NUMBER (215) 546-1433	FAX NUMBER (215) 644-8754		
SUPREME COURT IDENTIFICATION NO. 61815		E-MAIL ADDRESS david@victimrecoverylaw.com	
SIGNATURE OF FILING ATTORNEY OR PARTY DAVID THIRUSELVAM		DATE SUBMITTED Tuesday, August 29, 2023, 09:07 am	

Case ID: 230802980

VICTIMS RECOVERY LAW CENTER

BY: David P. Thiruselvam, Esquire

Keith Thomas West, Esquire

Identification Nos.: 61815/317426

121 South Broad Street

Eighteenth Floor

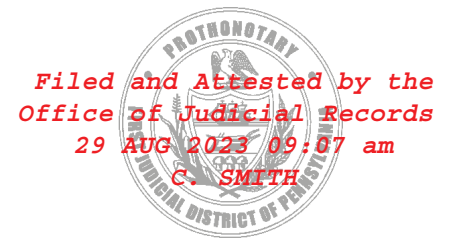
Philadelphia, PA 19107

(215) 546-1433 - Telephone

(215) 644-8754 - Facsimile

david@victimrecoverylaw.com

keith@victimrecoverylaw.com



Attorneys for Plaintiffs

HECTOR GARCIA and ROSEANN MORRISON	:	COURT OF COMMON PLEAS
Individually and as Co-Administrators of the	:	PHILADELPHIA COUNTY, PA
Estate of SAHMYA GARCIA, Deceased	:	MAJOR JURY TRIAL DEMANDED
1719 Kossuth Street	:	AUGUST TERM, 2023
Camden, NJ 08104	:	NO.
and	:	
206 W. Buck Street	:	
Paulsboro, NJ 08606	:	
v.	:	
POLYMER80, INC.	:	
134 Lakes Blvd.	:	
Dayton, NV 89403	:	
and	:	
MARCUS BURNEY (PP No.: 816759)	:	
Curran-Fromhold Correctional Facility	:	
7901 State Road	:	
Philadelphia, PA 19136	:	

PRAECIPE TO ISSUE WRIT OF SUMMONS

TO THE PROTHONOTARY:

Kindly issue a Writ of Summons against the defendants in the above matter.

VICTIMS RECOVERY LAW CENTER

David P. Thiruselvam

Date: 08/29/2023

DAVID P. THIRUSELVAM, ESQUIRE
Attorney for Plaintiffs

Commonwealth of Pennsylvania

COUNTY OF PHILADELPHIA

HECTOR GARCIA and ROSEANN MORRISON
Individually and as Co-Administrators of the
Estate of SAHMYA GARCIA, Deceased

Plaintiff

vs.

POLYMER80, INC.

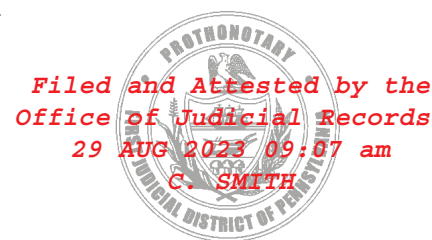
and

MARCUS BURNEY PP# 816759

Defendant

AUGUST Term, 20__23

No. _____



To¹

POLYMER80, INC.

and

MARCUS BURNEY PP# 816759

Writ of Summons

You are notified that the Plaintiff²

Usted esta avisado que el demandante

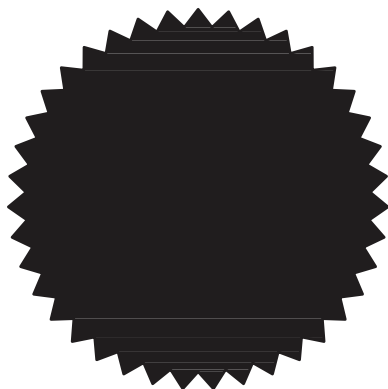
HECTOR GARCIA and ROSEANN MORRISON

Individually and as Co-Administrators of the

Estate of SAHMYA GARCIA, Deceased

Has (have) commenced an action against you.

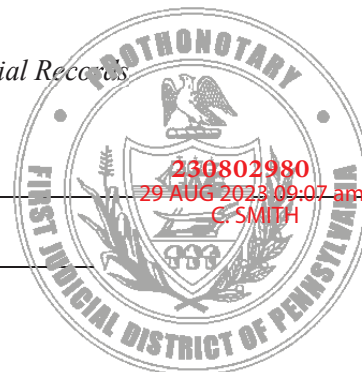
Ha (han) iniciado una accion en contra suya.



ERIC FEDER
Director, Office of Judicial Records

By: _____

Date: _____



¹ Name(s) of Defendant(s)

² Name(s) of Plaintiff(s)

Court of Common Pleas

AUGUST Term, 20 23

No. _____

HECTOR GARCIA and ROSEANN MORRISON
Individually and as Co-Administrators of the
Estate of SAHMYA GARCIA, Deceased

Plaintiff

^{vs.}
POLYMER80, INC.,
and MARCUS BURNEY PP# 816759

Defendant

SUMMONS



September 12, 2023

Dear David Thiruselvam:

The following is in response to your request for proof of delivery on your item with the tracking number:
9410 8036 9930 0163 0321 17.

Item Details

Status:	Delivered, Left with Individual
Status Date / Time:	September 11, 2023, 12:17 pm
Location:	DAYTON, NV 89403
Postal Product:	Priority Mail®
Extra Services:	Signature Confirmation™ Up to \$100 insurance included
Recipient Name:	POLYMER80 INC
Actual Recipient Name:	M WELCH

Note: Actual Recipient Name may vary if the intended recipient is not available at the time of delivery.

Shipment Details

Weight:	1lb, 1.0oz
----------------	------------

Recipient Signature

Signature of Recipient:

M Welch
In Person

Address of Recipient:

134 Lakes

Note: Scanned image may reflect a different destination address due to Intended Recipient's delivery instructions on file.

Thank you for selecting the United States Postal Service® for your mailing needs. If you require additional assistance, please contact your local Post Office™ or a Postal representative at 1-800-222-1811.

Sincerely,
United States Postal Service®
475 L'Enfant Plaza SW
Washington, D.C. 20260-0004

IN THE COURT OF COMMON PLEAS PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION - CIVIL

HECTOR GARCIA and ROSEANN MORRISON
Individually and as Co-Administrators
of the Estate of SAHMYA GARCIA, Deceased

Plaintiff

v.

POLYMER80, INC.
and MARCUS BURNEY PP# 816759
Defendant

August

NO. 230802980

Filed and Attested by the
Office of Judicial Records
29 AUG 2023 04:05 pm
B. MERCEDES

RETURN OF SERVICE/AFFIDAVIT

I, ALEX zykov, hereby certify that I served a true and
correct copy of the Complaint / Notice of Appeal / Rule on Marcus Burney,
(Insert Name of Party)

1) By handing a copy to the Defendant / Appellee, _____,
on the ____ day of _____, 20____, at _____ AM/PM, at
_____, Philadelphia, PA.

2) By handing a copy to LT L. HELL, an adult
member of the family/adult person in charge of Defendant's / Appellee's residence,
on the 29 day of August, 2023, at 3:28 AM (P) at
7901 State rd, Philadelphia, PA.

I verify that the statements in this Return of Service are true and correct. I further verify
that I am an adult over the age of 18 and not related to any party in this action.
I understand that this unsworn document contains statements that are made subject to
the penalties of 18 P.C.S. §4904 relating to unsworn falsification to authorities.

Sworn to and Affirmed
This 29 day August 2023

Veronica A. Malorano
Notary Public
(SEAL) Philadelphia County
My Commission Expires June 17, 2027
Commission Number 1100518

A. zykov (Sign)
ALEX zykov (Print Name)